

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**  
**Bid Protest**

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TRANSWORLD SYSTEMS, INC.,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

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Case No. 24-1791 C

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**PLAINTIFF’S MOTION FOR A PROTECTIVE ORDER**  
**AND LEAVE TO FILE UNDER SEAL**

Plaintiff, Transworld Systems, Inc. (“TSI”), respectfully requests that the United States Court of Federal Claims grant it leave to file its bid protest complaint under seal. Plaintiff further requests that the Court issue the standard Form 8, Protective Order in Procurement Protest Cases, under the Rules of the Court of Federal Claims.

TSI’s bid protest complaint contains information that is subject to a protective order issued by the U.S. Government Accountability Office (“GAO”) in the matter of Transworld Systems, Inc., B-422308.2; B-422308.4. Paragraph 8 of that Protective Order states:

Protected material obtained under this protective order may be used, however, in a bid protest filed with the United States Court of Federal Claims, without GAO’s prior authorization, provided that the information is filed under seal with the Court, that the Court is informed of GAO’s protective order, and that the Court is requested to issue its own protective order to cover the protected material.

In addition to complying with this requirement, TSI requests that the Court issue a protective order because the complaint contains confidential and source selection sensitive information, such as information relating to TSI’s proposal and the procuring agency’s confidential evaluation. In addition, the administrative record will contain confidential and source selection sensitive material,

including the proprietary information of TSI and the awardee, which should not be released publicly.

Therefore, in accordance with Appendix C, Rule 6 of the Rules of the Court of Federal Claims, TSI has marked the complaint as proprietary and confidential, and is concurrently filing a proposed redacted version of this document with the Court.

Dated: October 31, 2024

Respectfully submitted,



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